INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

January 7, 2004

TO: Interested Parties / Applicant

RE: BRC Rubber Group, Montpelier Division / MSM 009-18297-00002

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-MOD.dot 9/16/03

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January 7, 2004

Mr. Thom Maher
BRC Rubber Group, Montpelier Division
P.O. Box 227
Churubusco, IN 46723

Re: **009-18297**
Minor Source Modification to:
Part 70 Operating Permit No.: **T 009-7492-00002**

Dear Mr. Maher:

BRC Rubber Group, Montpelier Division was issued Part 70 Operating Permit **T 009-7492-00002** on June 23, 2000 for a stationary miscellaneous automotive rubber parts manufacturing and coating source. An application to modify the source was received on October 30, 2003. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

(a) One (1) natural gas-fired boiler, with No. 2 fuel oil as a backup fuel, known as BLR1, rated at 16.74 million British thermal units per hour, installed in 1980, exhausting to Stack S1.

(b) One (1) natural gas fired burn off oven, known as FURN1, consisting of a primary chamber rated at 0.185 million British thermal units per hour and a secondary chamber rated at 0.290 million British thermal units per hour, capacity: 10.0 pounds of waste per hour.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l), the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This minor source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 Operating Permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter contact Mark L. Kramer, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395, ext. 12 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments (TSD and MSM)
MLK/MES
cc: File - Blackford County
Blackford County Health Department
Air Compliance Section Inspector - Ryan Hillman
Compliance Branch - Karen Ampil
Administrative and Development
Technical Support and Modeling - Michele Boner

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PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

BRC Rubber Group, Montpelier Division
623 West Monroe
Montpelier, Indiana 47359

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 009 - 7492 - 00002	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 23, 2000 Expiration Date: June 23, 2005

First Minor Source Modification No.: 009-18297-00002	Conditions Affected: A.2, A.3, D.1.1 through D.1.7, D.5.2 and D.5.3. Sections Affected: D.1 and D.5
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 7, 2004

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary miscellaneous automotive rubber parts manufacturing and coating source.

Responsible Official:	Thom Maher
Source Address:	623 West Monroe, Montpelier, Indiana 47359
Mailing Address:	589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Phone Number:	219 - 693 - 2171
SIC Code:	3069
County Location:	Blackford
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) natural gas-fired boiler, with No. 2 fuel oil as a backup fuel, known as BLR1, rated at 16.74 million British thermal units per hour, installed in 1980, exhausting to Stack S1.

(b) One (1) natural gas-fired boiler, known as BLR2, rated at 12.50 million British thermal units per hour, installed in 1979, exhausting to Stack S2.

(c) One (1) paint booth, known as PB1, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-5, installed in 1993, exhausting to Stack S5, capacity: 2,000 automotive parts per hour.

(d) One (1) paint booth, known as PB2, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-6, installed in 1993, exhausting to Stack S6, capacity: 2,000 automotive parts per hour.

(e) One (1) paint booth, known as PB3, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-7, installed in 1993, exhausting to Stack S7, capacity: 2,000 automotive parts per hour.

(f) One (1) paint booth (small chain-on-edge), known as PB4, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-8, installed in 1993,exhausting to Stack S8, capacity: 280 automotive parts per hour.

(g) One (1) paint booth, known as PB5, equipped with HVLP spray applicators, equipped with

water wash for PM overspray control, known as CE-9, installed in 1993, exhausting to Stack

Other activities with PM less five (5) pounds per hour or twenty-five (25) pounds per day.

(a) PMILL, RPRCSS rubber making/primary mill (326 IAC 6-3).

(b) SMILL, RPRCSS rubber making/secondary mill (326 IAC 6-3).

(c) RCOAT, rubber coating (326 IAC 6-3).

(d) PMIX, primary, Banbury mixer (326 IAC 6-3).

(e) SMIX, secondary, Shaw mixer (326 IAC 6-3).

(f) SBlAST, self-contained sand blaster (326 IAC 6-3).

(g) CSILOs, three (3) carbon silos (326 IAC 6-3).

(h) Phosline phosphate line (326 IAC 6-3).

(i) One (1) natural gas fired burn off oven, known as FURN1, consisting of a primary chamber rated at 0.185 million British thermal units per hour and a secondary chamber rated at 0.290 million British thermal units per hour, capacity: 10.0 pounds of waste per hour (326 IAC 4-2).

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Boilers

(a) One (1) natural gas-fired boiler, with No. 2 fuel oil as a backup fuel, known as BLR1, rated at 16.74 million British thermal units per hour, installed in 1980, exhausting to Stack S1.

(b) One (1) natural gas-fired boiler, known as BLR2, rated at 12.50 million British thermal units per hour, installed in 1979, exhausting to Stack S2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2]

(a) Pursuant to 326 IAC 6-2-3(a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (c)), particulate emissions from the natural gas fired boiler, BLR2, used for indirect heating purposes which was existing and in operation on or before September 21, 1983, shall in no case exceed 1.50 pounds of particulate matter per million British thermal units heat input.

(b) Pursuant to 326 IAC 6-2-4(a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (d)), particulate emissions from the natural gas-fired boiler, BLR1, with No. 2 fuel oil as a backup fuel, used for indirect heating purposes which was existing and in operation on or after September 21, 1983, shall in no case exceed 0.453 pounds of particulate matter per million British thermal units heat input.

D.1.2 No. 2 Fuel Oil Throughput Limit [326 IAC 2-7-10.5]

The total input of No. 2 fuel oil to the boiler (BLR1) shall be limited to 702.68 kilogallons per twelve (12) consecutive month period with compliance determined at the end of each month. This fuel oil limit is equivalent to less than 24.9 tons per year of SO2. Compliance with this limit will assure that the SO2 emissions from the MSM 009-18297-00009 shall remain less than twenty-five (25) tons per year and that the requirements of 326 IAC 2-7-10.5(f) are not applicable.

D.1.3 Sulfur Dioxide (SO2) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO2 Emissions Limitations) the SO2 emissions from the 16.74 million British thermal units per hour oil-fired boiler (BLR1) shall not exceed five tenths (0.5) pound per million British thermal units heat input. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a thirty (30) day rolling weighted average.

D.1.4 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million British thermal units heat input by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures

in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the 16.74 British thermal units per hour boiler (BLR1), using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Visible Emissions Notations

(a) Visible emission notations of the Boiler (BLR1) Stack S1 exhaust shall be performed once per shift during normal daylight operations when burning No. 2 fuel oil. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.6 Record Keeping Requirements

(a) To document compliance with Condition D.1.2, the Permittee shall maintain records of the total amount of No. 2 fuel oil burned in boiler BLR1 each month.

(b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below.

(1) Calendar dates covered in the compliance determination period;

(2) Actual daily fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications;

(5) The name of the fuel supplier; and

(6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

(c) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the boiler (BLR1) Stack S1 exhaust once per shift when burning No. 2 fuel oil.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

(a) The natural gas fired boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

Other activities with PM less five (5) pounds per hour or twenty-five (25) pounds per day:

(a) PMILL, RPRCSS rubber making/primary mill (326 IAC 6-3).

(b) SMILL, RPRCSS rubber making/secondary mill (326 IAC 6-3).

(c) RCOAT, rubber coating (326 IAC 6-3).

(d) PMIX, primary, Banbury mixer (326 IAC 6-3).

(e) SMIX, secondary, Shaw mixer (326 IAC 6-3).

(f) SBlAST, self-contained sand blaster (326 IAC 6-3).

(g) CSILOs, three (3) carbon silos (326 IAC 6-3).

(h) Phosline phosphate line (326 IAC 6-3).

(i) One (1) natural gas fired burn off oven, known as FURN1, consisting of a primary chamber rated at 0.185 million British thermal units per hour and a secondary chamber rated at 0.290 million British thermal units per hour, capacity: 10.0 pounds of waste per hour (326 IAC 4-2).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from these facilities shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.5.2 Incinerators [326 IAC 4-2]

The one (1) burn off oven, known as FURN1, which emits regulated pollutants shall:

(a) Consist of primary and secondary chambers or the equivalent.

(b) Be equipped with a primary burner unless burning only wood products.

(c) Comply with 326 IAC 5-1 and 326 IAC 2.

(d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications

or an operation and maintenance plan as specified in Condition D.5.2(g).

(e) Not emit particulate matter in excess five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with solid waste capacity less than two hundred (200) pounds per hour.

(f) If any of the requirements of Conditions D.5.2 (a) through (e) are not met, then the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

(g) A Permittee developing an operation and maintenance plan pursuant to Condition D.5.2 (d) must comply with the following:

(1) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in Condition D.5.2(e) and include the following:

(A) Procedures for receiving, handling, and charging waste.

(B) Procedures for incinerator startup and shutdown.

(C) Procedures for responding to a malfunction.

(D) Procedures for maintaining proper combustion air supply levels.

(E) Procedures for operating the incinerator and associated air pollution control systems.

(F) Procedures for handling ash.

(G) A list of wastes that can be burned in the incinerator.

(2) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.

(3) The operation and maintenance plan must be readily accessible to incinerator operators.

(4) The Permittee of the incinerator shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.

(h) The Permittee of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the IDEM, OAQ upon request.

Compliance Determination Requirement [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

There are no specific Compliance Determination Requirements for these emission units.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

D.5.3 Afterburner Operation

The afterburner for control shall be in operation at all times when the incineration process is in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: BRC Rubber Group, Montpelier Division
Source Address: 623 West Monroe, Montpelier, Indiana 47359
Mailing Address: P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-7492-00002
Facility: Boiler (BRL1)
Parameter: Throughput of No. 2 Fuel Oil
Limit: Less than 702.68 kilogallons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	No. 2 Fuel Oil This Month	No. 2 Fuel Oil Previous 11 Months	No. 2 Fuel Oil 12 Month Total
	(gallons)	(gallons)	(gallons)

? No deviation occurred in this month.

? Deviation/s occurred in this month.

Deviation has been reported on:

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for Part 70
Minor Source and Significant Permit Modifications

Source Background and Description

Source Name:	BRC Rubber Group, Montpelier Division
Source Location:	623 West Monroe, Montpelier, Indiana 47359
County:	Blackford
SIC Code:	3069
Operation Permit No.:	T 009 - 7492 - 00002
Operation Permit Issuance Date:	June 23, 2000
Minor Source Modification No.:	009-18297-00002
Significant Permit Modification No.:	009-18357-00002
Permit Reviewer:	Mark L. Kramer

The Office of Air Quality (OAQ) has reviewed a modification application from BRC Rubber Group, Montpelier Division relating to the construction and operation of the following emission units and pollution control devices:

(a) One (1) natural gas-fired boiler, with No. 2 fuel oil as a backup fuel, known as BLR1, rated at 16.74 million British thermal units per hour, installed in 1980, exhausting to Stack S1.

(b) One (1) natural gas fired burn off oven, known as FURN1, consisting of a primary chamber rated at 0.185 million British thermal units per hour and a secondary chamber rated at 0.290 million British thermal units per hour, capacity: 10.0 pounds of waste per hour.

History

On October 30, 2003, BRC Rubber Group submitted an application to the OAQ requesting to add No. 2 fuel oil as a backup fuel to the previously permitted natural gas fired boiler (BLR1) and to install a natural gas fired burn off oven (FURN1). BRC Rubber Group was issued a Part 70 Operating Permit on June 23, 2000.

In addition, the source has documented the existence of a 300 gallon fuel oil storage tank, installed in 1994. This storage tank is an insignificant activities and is not a specifically regulated activity.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (?F)
S1	Boiler (BLR1)	36.0	2.0	2,000	350

S26	Burn Off Oven (FURN1)	24.0	1.25	450 - 650	1400 - 1600

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification and the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on October 30, 2003. Additional information was received on December 9 and 10, 2003.

Emission Calculations

See pages 1 through 3 of Appendix A of this document for detailed emissions calculations.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	**Potential To Emit** (tons/year)
PM	1.21
PM_{10}	1.21
SO_2	37.7
VOC	0.246
CO	2.87
NO_X	10.7

HAPs	**Potential To Emit** (tons/year)
Arsenic Compounds	0.0003
Beryllium Compounds	0.0002
Cadmium Compounds	0.0002
Chromium Compounds	0.0002

HAPs	Potential To Emit (tons/year)
Lead Compounds	0.001
Mercury Compounds	0.0002
Manganese Compounds	0.0004
Nickel Compounds	0.0002
Selenium Compounds	0.001
TOTAL	0.004

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(5)(D). The SO_2 emissions from this modification are limited to less than twenty five (25) tons per year by limiting the amount of No. 2 fuel oil burned to less than 702.68 kilogallons per year. Therefore, this modification qualifies as a minor modification pursuant to this rule.

The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification (SPM 009-18357-00002) in accordance with 326 IAC 2-7-12(d) because pursuant to 326 IAC 2-7-12(b)(1)(B), a permit modification can not be minor if it requires significant changes to existing monitoring record keeping or reporting requirements. The throughput limit for No. 2 fuel oil requires new record keeping and reporting requirements. The Significant Permit Modification will give the source approval to operate the proposed emission unit.

County Attainment Status

The source is located in Blackford County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Blackford County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Blackford County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for

Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	**Emissions** (tons/year)
PM	10.3
PM_{10}	11.0
SO_2	1.08
VOC	194
CO	13.8
NO_X	14.8

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions are based upon the Technical Support Document for the Part 70 Operating Permit T 009-7492-00002, issued June 23, 2000.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls and the additional of the insignificant burn off oven. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Proposed Modification	0.856	0.856	less than 25.0	0.185	1.98	7.10	0.002
PSD Threshold Level	250	250	250	250	250	250	-

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

SO_2 emissions from this modification will be limited to less than twenty five (25) tons per year by limiting the amount of No. 2 fuel oil burned in the boiler BLR1 to less than 702.68 kilogallons per twelve (12) consecutive month period.

Federal Rule Applicability

(a) This significant permit modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for any of the pollutants, including sulfur dioxide:

(1) with the potential to emit before controls equal to or greater than the major source threshold for any of the pollutants, including sulfur dioxide;

(2) that is subject to an emission limitation or standard for any of the pollutants, including sulfur dioxide; and

(3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this modification.

(b) The boiler, known as BLR1, is still not subject to the requirements of the New Source Performance Standard, 326 IAC 12-1, (40 CFR 60.40c), Subpart Dc since this boiler as originally constructed in 1980, before the June 9, 1989 applicability date of this NSPS, was configured to burn both natural gas and fuel oil. Therefore, this source modification is not a reconstruction or modification of this boiler.

(c) The boiler, known as BLR1, is still not subject to the requirements of the New Source Performance Standard, 326 IAC 12-1, (40 CFR 60.40b), Subpart Db since this boiler constructed in 1980 is prior to the applicability date of June 19, 1984.

(d) The boiler, known as BLR1, is still not subject to the requirements of the New Source Performance Standard, 326 IAC 12-1, (40 CFR 60.40a), Subpart Da since this boiler constructed in 1980 is after the applicability date of September 18, 1978, but has a rating of less than 250 million British thermal units per hour and therefore is not subject to this Subpart.

(e) The boiler, known as BLR1, is still not subject to the requirements of the New Source Performance Standard, 326 IAC 12-1, (40 CFR 60.40), Subpart D since this boiler constructed in 1980 has a rating of less than 250 million British thermal units per hour, was constructed after the applicability date of August 17, 1971 and is not a steam generating unit.

(f) The 300 gallon fuel storage tank constructed in 1994 is not subject to the New Source Performance Standards (NSPS) Subpart Kb because the capacity of the tank is less than 40 cubic meters (10,567 gallons).

(g) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are applicable to this source because the source is a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs) and the source includes one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002, specifically 40 CFR Part 63 Subpart DDDDD, Industrial, Commercial & Institutional Boilers and Process Heaters.

(1) This rule requires the source to:

(A) Submit a Part 1 MACT Application by May 15, 2002; and

(B) Submit a Part 2 MACT Application within twenty-four (24) months after the Permittee submitted a Part 1 MACT Application.

(2) The Permittee failed to submit a timely Part 1 MACT Application. IDEM, OAQ has requested that the Permittee submit a Part 1 MACT Application. The Permittee is required to submit a Part 2 MACT Application on or before May 15, 2004. Note that on April 25, 2002, Earthjustice filed a lawsuit against the US EPA regarding the April 5, 2002 revisions to the rules implementing Section 112(j) of the Clean Air Act. In particular, Earthjustice is challenging the US EPA's 24-month period between the Part 1 and Part 2 MACT Application due dates. Therefore, the Part 2 MACT Application due date may be changed as a result of the suit. Based on a proposed settlement published in the August 26, 2002 *Federal Register*, it appears that US EPA intends to revise the rule so that the due date of the Part 2 MACT Application will be within twelve (12) months after the Permittee submitted the Part 1 MACT application.

(3) Pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The MACT and the General Provisions of 40 CFR 63, Subpart A will become new applicable requirements, as defined by 326 IAC 2-7-1(6), that must be incorporated into the Part 70 permit. After IDEM, OAQ receives the initial notification, any of the following will occur:

(A) If three (3) or more years remain on the Part 70 permit term at the time the MACT is promulgated, IDEM, OAQ will notify the source that IDEM, OAQ will reopen the permit to include the MACT requirements pursuant to 326 IAC 2-7-9; or

(B) If less than three (3) years remain on the Part 70 permit term at the time the MACT is promulgated, the Permittee must include information regarding the MACT in the renewal application, including the information required in 326 IAC 2-7-4(c); or

(C) The Permittee may submit an application for a significant permit modification under 326 IAC 2-7-12 to incorporate the MACT requirements. The application may include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This modification of using No. 2 fuel oil in the Boiler (BLR1) and adding an insignificant activity (burn off oven) are not subject to the requirements of 326 IAC 2-2 since the potential to emit are less than the PSD threshold levels for this existing minor PSD source.

326 IAC 4-2 (Incinerators)

The one (1) burn off oven, known as FURN1, which emits regulated pollutants shall:

(a) Consist of primary and secondary chambers or the equivalent.

(b) Be equipped with a primary burner unless burning only wood products.

(c) Comply with 326 IAC 5-1 and 326 IAC 2.

(d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in subsection (g).

(e) Not emit particulate matter in excess five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with solid waste capacity less than two hundred (200) pounds per hour.

(f) If any of the requirements of subsections (a) through (e) are not met, then the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

(g) A Permittee developing an operation and maintenance plan pursuant to subsection (d) must comply with the following:

(1) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in subsection (e) and include the following:

(A) Procedures for receiving, handling, and charging waste.

(B) Procedures for incinerator startup and shutdown.

(C) Procedures for responding to a malfunction.

(D) Procedures for maintaining proper combustion air supply levels.

(E) Procedures for operating the incinerator and associated air pollution control systems.

(F) Procedures for handling ash.

(G) A list of wastes that can be burned in the incinerator.

(2) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.

(3) The operation and maintenance plan must be readily accessible to incinerator operators.

(4) The Permittee of the incinerator shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.

(h) The Permittee of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the IDEM, OAQ upon request.

326 IAC 6-2-3 (Emission limitations for facilities specified in 326 IAC 6-2-1(c))

The 12.50 million British thermal units per hour rated natural gas fired boiler (BRL2), constructed and placed into operation prior to September 21, 1983, is still subject to 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating).

Pursuant to 326 IAC 6-2-3, particulate matter emissions from indirect heating facilities existing and in operation before September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{C * a * h}{76.5 * Q^{0.75} * N^{0.25}}$$

Pt = lbs of PM emitted per MMBtu heat input
C = maximum ground level concentration (default = 50 ug/m^3)
a = plume rise factor (default = 0.67 for Q less than 1,000 MMBtu/hr)
h = stack height in feet (minimum height = 22.75 feet)
Q = total source maximum operating capacity (12.50)
N = number of stacks in fuel burning operation (1)

$$Pt = \frac{50 \text{ ug/m}^3 * 0.67 * 22.75}{76.5 * 12.50^{0.75} * 1^{0.25}} = 1.50$$ pounds of particulate matter emitted per MMBtu heat input

The PM emissions from the boiler (BLR2) on natural gas are based on an emission factor of 1.9 pounds per million cubic feet of natural gas. This emission factor is equivalent to 0.019 pounds per million British thermal units heat input and therefore, this boiler complies with this rule.

326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(d))

The 16.74 million British thermal units per hour rated boiler (BLR1) on natural gas is being modified to burn No. 2 fuel oil after September 21, 1983, and therefore will be subject to 326 IAC 6-2-4 (Emissions Limitations for facilities specified in 326 IAC 6-2-1(d).

Pursuant to 326 IAC 6-2-4, particulate matter emissions from indirect heating facilities existing and in operation after September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Pt = lbs of PM emitted per MMBtu heat input
Q = total source maximum operating capacity (29.24)

$$Pt = \frac{1.09}{29.24^{0.26}} = 0.453$$ pounds of particulate matter emitted per MMBtu

The PM emissions from the boiler (BLR1) are 0.014 pounds per million British thermal units heat input on oil from the information presented on page 1 of 3 of Appendix A (1.06 ton/year / 16.74 mmBtu/hr). Therefore, this boiler complies with this rule.

326 IAC 7-1 (SO_2 Emissions Limitations)

Pursuant to 326 IAC 7-1.1 (SO_2 Emissions Limitations) the SO_2 emissions from 16.74 million British thermal units per hour boiler (BLR1) shall not exceed five tenths (0.5) pounds per million British thermal units heat input. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a thirty (30) day rolling weighted average.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

(a) The boiler (BLR1) has applicable compliance monitoring conditions as specified below:

(1) Visible emissions notations of the boiler (BLR1) Stack S1 exhaust shall be performed once per shift during normal daylight operations when burning No. 2 fuel oil. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(2) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because boiler on No. 2 fuel oil must operate properly to ensure compliance with 326 IAC 5-1 and 326 IAC 2-7 (Part 70).

(b) The burn off oven (FURN1) has applicable compliance monitoring conditions as specified below:

The afterburner for control shall be in operation at all times when the burn off process is in operation.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) natural gas-fired boiler, **with No. 2 fuel oil as a backup fuel,** known as BLR1, rated at 16.74 million British thermal units per hour, installed in 1980, exhausting to Stack S1.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

Other activities with PM less five (5) pounds per hour or twenty-five (25) pounds per day ~~(326 IAC 6-3)~~.

(a) PMILL, RPRCSS rubber making/primary mill **(326 IAC 6-3)**.

(b) SMILL, RPRCSS rubber making/secondary mill **(326 IAC 6-3)**.

(c) RCOAT, rubber coating **(326 IAC 6-3)**.

(d) PMIX, primary, Banbury mixer **(326 IAC 6-3)**.

(e) SMIX, secondary, Shaw mixer **(326 IAC 6-3)**.

(f) SBlAST, self-contained sand blaster **(326 IAC 6-3)**.

(g) CSILOs, three (3) carbon silos **(326 IAC 6-3)**.

(h) Phosline phosphate line **(326 IAC 6-3)**.

(i) One (1) natural gas fired burn off oven, known as FURN1, consisting of a primary chamber rated at 0.185 million British thermal units per hour and a secondary chamber rated at 0.290 million British thermal units per hour, capacity: 10.0 pounds of waste per hour (326 IAC 4-2).

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] **Boilers**

(a) One (1) natural gas-fired boiler, **with No. 2 fuel oil as a backup fuel,** known as BLR1, rated at 16.74 million British thermal units per hour, installed in 1980, exhausting to Stack S1.

(b) One (1) natural gas-fired boiler, known as BLR2, rated at 12.50 million British thermal units per hour, installed in 1979, exhausting to Stack S2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2]

(a) Pursuant to 326 IAC 6-2-3(a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (c)), particulate emissions from the ~~two (2)~~ natural gas-fired boiler, ~~BLR1 and~~ BLR2, used for indirect heating purposes which was existing and in operation on or before September 21, 1983, shall in no case exceed **1.50** ~~0.666~~ pounds of particulate matter per million British thermal units heat input.

(b) Pursuant to 326 IAC 6-2-4(a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (d)), particulate emissions from the natural gas-fired boiler, BLR1, with No. 2 fuel oil as a backup fuel, used for indirect heating purposes which was existing and in operation on or after September 21, 1983, shall in no case exceed 0.453 pounds of particulate matter per million British thermal units heat input.

D.1.2 No. 2 Fuel Oil Throughput Limit [326 IAC 2-7-10.5]

The total input of No. 2 fuel oil to the boiler (BLR1) shall be limited to 702.68 kilogallons per twelve (12) consecutive month period with compliance determined at the end of each month. This fuel oil limit is equivalent to less than 24.9 tons per year of SO_2. Compliance with this limit will assure that the SO_2 emissions from the MSM 009-18297-00009 shall remain less than twenty-five (25) tons per year and that the requirements of 326 IAC 2-7-10.5(f) are not applicable.

Compliance Determination Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

~~D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]~~

~~The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if these facilities are in compliance. If testing is required by IDEM, compliance with the particulate matter (PM) limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

D.1.3 Sulfur Dioxide (SO_2) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO_2 Emissions Limitations) the SO_2 emissions from the 16.74 million British thermal units per hour oil-fired boiler (BLR1) shall not exceed five tenths (0.5) pound per million British thermal units heat input. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a thirty (30) day rolling weighted average.

D.1.4 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million British thermal units heat input by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the 16.74 British thermal units per hour boiler (BLR1), using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Visible Emissions Notations

(a) Visible emission notations of the Boiler (BLR1) Stack S1 exhaust shall be performed once per shift during normal daylight operations when burning No. 2 fuel oil. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.6 Record Keeping Requirements

(a) To document compliance with Condition D.1.2, the Permittee shall maintain records

of the total amount of No. 2 fuel oil burned in boiler BLR1 each month.

(b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below.

(1) Calendar dates covered in the compliance determination period;

(2) Actual daily fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications;

(5) The name of the fuel supplier; and

(6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

(c) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the boiler (BLR1) Stack S1 exhaust once per shift when burning No. 2 fuel oil.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.~~7~~**3** Reporting Requirements

(a) The natural gas fired boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

Other activities with PM less five (5) pounds per hour or twenty-five (25) pounds per day ~~(326 IAC 6-3)~~.

(a) PMILL, RPRCSS rubber making/primary mill **(326 IAC 6-3)**.

(b) SMILL, RPRCSS rubber making/secondary mill **(326 IAC 6-3)**.

(c) RCOAT, rubber coating **(326 IAC 6-3)**.

(d) PMIX, primary, Banbury mixer **(326 IAC 6-3)**.

(e) SMIX, secondary, Shaw mixer **(326 IAC 6-3)**.

(f) SBlAST, self-contained sand blaster **(326 IAC 6-3)**.

(g) CSILOs, three (3) carbon silos **(326 IAC 6-3)**.

(h) Phosline phosphate line **(326 IAC 6-3)**.

(i) One (1) natural gas fired burn off oven, known as FURN1, consisting of a primary chamber rated at 0.185 million British thermal units per hour and a secondary chamber rated at 0.290 million British thermal units per hour, capacity: 10.0 pounds of waste per hour (326 IAC 4-2).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.2 Incinerators [326 IAC 4-2]

The one (1) burn off oven, known as FURN1, which emits regulated pollutants shall:

(a) Consist of primary and secondary chambers or the equivalent.

(b) Be equipped with a primary burner unless burning only wood products.

(c) Comply with 326 IAC 5-1 and 326 IAC 2.

(d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in Condition D.5.2(g).

(e) Not emit particulate matter in excess five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with solid waste capacity less than two hundred (200) pounds per hour.

(f) If any of the requirements of Conditions D.5.2 (a) through (e) are not met, then the Permittee shall stop charging the incinerator until adjustments are made that address

the underlying cause of the deviation.

(g) A Permittee developing an operation and maintenance plan pursuant to Condition D.5.2 (d) must comply with the following:

(1) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in Condition D.5.2(e) and include the following:

(A) Procedures for receiving, handling, and charging waste.

(B) Procedures for incinerator startup and shutdown.

(C) Procedures for responding to a malfunction.

(D) Procedures for maintaining proper combustion air supply levels.

(E) Procedures for operating the incinerator and associated air pollution control systems.

(F) Procedures for handling ash.

(G) A list of wastes that can be burned in the incinerator.

(2) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.

(3) The operation and maintenance plan must be readily accessible to incinerator operators.

(4) The Permittee of the incinerator shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.

(h) The Permittee of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the IDEM, OAQ upon request.

Compliance Determination Requirement [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

~~D.5.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]~~

~~The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if these facilities are in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

There are no specific Compliance Determination Requirements for these emission units.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

D.5.3 Afterburner Operation

The afterburner for control shall be in operation at all times when the incineration process is in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: **BRC Rubber Group, Montpelier Division**
Source Address: **623 West Monroe, Montpelier, Indiana 47359**
Mailing Address: **P.O. Box 227, Churubusco, Indiana 46723**
Part 70 Permit No.: **T 009-7492-00002**
Facility: **Boiler (BRL1)**
Parameter: **Throughput of No. 2 Fuel Oil**
Limit: **Less than 702.68 kilogallons per twelve (12) consecutive month period with compliance determined at the end of each month**

YEAR: _____

Month	No. 2 Fuel Oil This Month	No. 2 Fuel Oil Previous 11 Months	No. 2 Fuel Oil 12 Month Total
	(gallons)	(gallons)	(gallons)

? **No deviation occurred in this month.**

? **Deviation/s occurred in this month.**

Deviation has been reported on:

Submitted by:

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached Part 70 Minor Source Modification No. 009-18297-00002 and proposed Part 70 Significant Permit Modification No. 009-18357-00002.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil

Company Name: **BRC Rubber Group - Montpelier Division**
Address, City IN Zip: **589 U.S. 33 South, Churubusco, Indiana 46723**
Permit Number: **MSM 009-18297**
Plt ID: **009-00002**
Reviewer: **Mark L. Kramer**
Application Date: **October 30, 2003**

BLR 1 on No. 2 Oil Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur 0.500	Limited Throughput kgals/year
16.74	1059		702.68

	Pollutant				
	PM*	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	2.00	71.0 *(142.0S)*	20.0	0.340	5.00
Potential Emission in tons/yr	**1.06**	**37.6**	**10.6**	**0.180**	**2.65**
Limited Potential Emission (tons/yr)	**0.703**	**24.9**	**7.03**	**0.119**	**1.76**

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 138,500 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.1385 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.
Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton
See page 2 for HAPs emission calculations.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
HAPs Emissions

Company Name: BRC Rubber Group - Montpelier Division
Address, City IN Zip: 589 U.S. 33 South, Churubusco, Indiana 46723
Permit Number: MSM 009-18297
Plt ID: 009-00002
Reviewer: Mark L. Kramer
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	HAPs - Metals				
	Arsenic	Beryllium	Cadmium	Chromium	Lead
Emission Factor in lb/mmBtu	0.000004	0.000003	0.000003	0.000003	0.000009
Potential Emission in tons/yr	0.0003	0.0002	0.0002	0.0002	0.001

	HAPs - Metals (continued)				Total
	Mercury	Manganese	Nickel	Selenium	HAPs
Emission Factor in lb/mmBtu	0.000003	0.000006	0.000003	0.000015	
Potential Emission in tons/yr	0.0002	0.0004	0.0002	0.001	**0.004**
Limited Emission in tons/yr					**0.002**

Methodology

No data was available in AP-42 for organic HAPs.
Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

Appendix A: Emission Calculations
Incinerator

Company Name: **BRC Rubber Group - Montpelier Division**
Address City IN Zip: **589 U.S. 33 South, Churbusco, Indiana 46723**
Permit Number: **MSM 009-18297**
Plt ID: **009-00002**
Reviewer: **Mark L. Kramer**
Application Date: **October 30, 2003**

FURN 1

THROUGHPUT lbs/hr	THROUGHPUT ton/yr
10	43.8

	POLLUTANT				
	PM	SO2	CO	VOC	NOX
Emission Factor in lb/ton	7.0	2.5	10.0	3.0	3.0
Potential Emissions in ton/yr	0.153	0.055	0.219	0.066	0.066

Methodology

Emission factors are from AP 42 (5th Edition 1/95) Table 2.1-12, Uncontrolled emission factors for industrial/commercial refuse combustors, multiple chambers
Throughput (lb/hr) * 8760 hr/yr * ton/2000 lb = throughput (ton/yr)